

REMARKS

This is intended as a full and complete response to the Final Office Action dated January 9, 2004, having a shortened statutory period for response set to expire on April 9, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-20 are pending in the application. Claims 1, 3-17 and 19-20 remain pending following entry of this response. Claims 2 and 18 have been canceled without prejudice. Claims 1, 4, 6, 11, 13, 14, 16 and 17 have been amended. However, Applicants submit that the amendments merely clarify, rephrase and/or restructure what was already recited. For example, claims 6 and 16 are amended to recite that input field information represents "a given one of at least two request types" of a request message format, which merely rephrases the original language that, in a given instance, the input field information is specific to only one request type, but avoids constructing the "input field information" as being limited to a particular request type (e.g., purchase order) in every instance. Claim 13 is similarly amended with respect to the output field information and is further amended to recite that the request type represented by the output field information is the same as the request type represented by the input field information, thereby making claim 13 conform to original claim 16 in this respect. Accordingly, none of the amendments can be considered new matter. Further, claims 1 and 16 are amended to recite aspects previously recited in claims 2 and 18, respectively.

Claims 1 - 20 stand rejected under 35 USC § 102(e) as being anticipated by *Ankireddipally et al.* (US 2002/0116205, hereinafter *Ankireddipally*). Applicants respectfully traverse the rejection. Withdrawal of the rejection is respectfully requested.

Applicants hereby incorporate their Response filed on October 31, 2003 in its entirety. In addition, Applicants make the following arguments.

Fundamentally, Applicants respectfully submit the Examiner misconstrues *Ankireddipally*. Regarding claim 1, for example, the Examiner refers to paragraph 0047, lines 5-15 as disclosing a data structure defining a message format for a particular eCommerce transaction type. However, this passage refers to the "basic transport assumption" of *Ankireddipally* and states that "...the present implementation of CXIP is

based on TCP/IP." TCP/IP is a well-known transport protocol and persons skilled in the art will therefore recognize that the passage clearly deals with issues of transferring data from one network location to another and does not elaborate at all on types of transactions and/or the interfaces used by those transactions to exchange data.

The Examiner further references paragraph 0043, lines 3-11 as describing a request message format consisting of a plurality of fields where input field information is at least a portion of the plurality of fields. Claim 1 refers to a "data structure configured as an interface definition of a message format...comprising: protocol information identifying a protocol and the particular eCommerce request type; request data format information...wherein the request message format comprises a plurality of input fields; and input field information...". The XML message referenced in the cited passage of *Ankireddipally* does not make any reference to the particular protocol (e.g. cXML, mXML), transaction type (e.g. purchase order, advanced shipping notice) nor does it describe the incoming request data as a set of discrete fields. The cited passage of *Ankireddipally* does refer to a "message type" attribute that is used to "manage message type sequencing and timing". Examples of message type include Request, Reply, and Cancel. However, these refer to the interaction model between two applications (e.g., who initiates the transaction and whether they can expect to receive a response) and does not identify a particular eCommerce protocol (e.g., cXML) nor a particular request type (e.g. a purchase order).

In response to Applicants' argument in their Response of October 31, 2003 that the referenced passage deals with data transport issues, the Examiner states that paragraph 0041, lines 1-10 and paragraph 0042 in combination define a transaction-oriented protocol which anticipates the present claims. Applicants disagree. The first cited passage concerns "...exchanging messages in the form of XML documents." The second cited passage states that "the CXIP application interaction protocol supports three of the most common types of application interaction models...request/reply, publish/subscribe and broadcast." Together, these define a "protocol" for representation of data exchanged (XML) and for the type of call/return semantics to be used (request/reply, publish/subscribe, broadcast). Accordingly, this "protocol" does not describe an eCommerce protocol (e.g. cXML), an eCommerce request type (e.g.

purchase order), request message format information and identification of the data fields being provided as input.

Regarding claim 16 the Examiner refers to some of the same passages that were referred to with respect to claim 1 and additionally to paragraph 0059, line 1-9, paragraph 0065, lines 15-25 and paragraph 0074, lines 5-13. Claim 16 recites "...a data structure configured as an interface definition of a request message format and a response message format of a particular eCommerce request type.." and "input field information" and "output field information", where the former is associated with the input provided with one or more request types and the latter is associated with the output generated for one or more request types. The first cited passage refers to "message types associated with a transaction instance". The message types are defined as "transaction request message, operation request message, operation response message and transaction response message." These refer to messages processed by the transaction service at different points within a given transaction lifecycle and do not indicate the protocol or transaction type (e.g. cXML, purchase order) nor the set of input and output data fields required by the given protocol/transaction type. Paragraph 0065, lines 15-25 refers to components describing the DAG that defines the flow of operations defined to service a given request. This is not at all related to the concepts of an interface definition for request and response message formats. Paragraph 0074, lines 5-13 refer to the internal operation of the CX server component of *Ankireddipally* and how the CX server passes an incoming request to the transaction service for processing. Again, this is not concerned with the issues of overall request and response interface definitions that is the subject of claim 16.

Perhaps most significantly, *Ankireddipally* does not provide for "input field information identifying at least a portion of the plurality of input fields and identifying a physical location, in a request message having the request message format, of each input field of at least the portion of the plurality of input fields". (See, claim 1.) Nor does *Ankireddipally* provide for "output field information identifying at least a portion of the plurality of output fields and identifying a physical location, in a response message having the response message format, of each input field of at least the portion of the plurality of output fields". This aspect of the present claims allows requests and

responses to be abstracted from specific applications handling the request and issuing the responses. In contrast, *Ankireddipally* presumes that the application logic in question is structured to deal with a DOM representation of the input data required by and output data generated by the application. As such, the CXIP message of *Ankireddipally* would not include input/output information mapping into incoming messages since the structure of the message is known. In this regard, Applicants again emphasize a significant misunderstanding on the part of the Examiner: the *Ankireddipally* data structure referred to by the Examiner is the eCommerce message itself. In contrast, the claimed data structure provides input/output information which identifies (i.e., maps into) the physical location of fields in eCommerce messages. Thus, the claimed data structure is not the eCommerce message itself.

For each of the foregoing reasons, Applicants submit that *Ankireddipally* does not teach, show or suggest the data structure of the present claims. Accordingly, Applicants believe the claims are allowable and respectfully request allowance of the same.

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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